

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Donald Abuda, et al.,

Plaintiffs,

v.

STRONGBLOCK, et al.

Defendants.

Case No. 1:22-cv-10869

DECLARATION OF MICHAEL J. ABRAMS

I, Michael J. Abrams, declare the following:

1. I am legal counsel for Defendants and am admitted *pro hac vice* in the above-captioned case.

2. Attached as **Exhibit A-1** to my Declaration is a compilation of documents publicly available from PACER that depict the online contracts discussed in *Feld v. Postmates, Inc.*, 442 F. Supp. 3d 825, 831 (S.D.N.Y. 2020); *Flores v. Chime Fin., Inc.*, No. 21-CV-4735 (RA), 2022 WL 873252, at *5 (S.D.N.Y. Mar. 23, 2022); *Thorne v. Square, Inc.*, No. 20CV5119NGGTAM, 2022 WL 542383, at *3 (E.D.N.Y. Feb. 23, 2022), appeal withdrawn, No. 22-542, 2022 WL 2068771 (2d Cir. Apr. 14, 2022) (yellow highlights added for emphasis); and *Starke v. Gilt Groupe, Inc.*, No. 13-CV-5497, 2014 WL 1652225, at *1 (S.D.N.Y. Apr. 24, 2014).

3. Attached as **Exhibit A-2** to my Declaration is a document publicly available from PACER that depicts the online contract discussed in *Starke v. SquareTrade, Inc.*, 913 F.3d 279, 289 (2d Cir. 2019).

4. Attached as **Exhibit A-3** to my Declaration is a document publicly available from PACER that depicts the online contracts discussed in *Plazza v. Airbnb, Inc.*, 289 F. Supp. 3d. 537, 553 (S.D.N.Y. 2018).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2023 by

/s/ Michael J. Abrams